

# Exhibit B

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING )  
PHARMACY, INC. PRODUCTS LIABILITY )  
LITIGATION )  
\_\_\_\_\_  
THIS DOCUMENT RELATES TO: )  
All Actions )  
 )

MDL No. 2419  
Dkt. No 1:13-md-2419 (FDS)

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**AFFIDAVIT OF C.J. GIDEON, JR.**

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STATE OF TENNESSEE  
COUNTY OF DAVIDSON

Comes C.J. Gideon, Jr., after first being duly sworn, and states as follows:

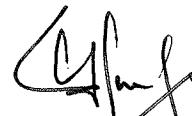
1. I am over 18 years of age, have personal knowledge of the facts contained herein, and am competent to testify to same.
2. I am a principal with the law firm of Gideon, Cooper & Essary in Nashville, Tennessee. I am lead counsel for various Tennessee Defendants. I represent the following Tennessee Defendants whose cases have been consolidated before this Honorable Court:

- a. Saint Thomas Outpatient Neurosurgical Center, LLC,
- b. Howell Allen Clinic, a Professional Corporation,
- c. John W. Culclasure, M.D.,
- d. Debra V. Schamberg, R.N.,
- e. Specialty Surgery Center, Crossville, PLLC,
- f. Kenneth R. Lister, M.D.,
- g. Kenneth Lister, M.D., PC., and
- h. Donald E. Jones, M.D.

3. I am currently scheduled to participate as the lead counsel for trials on the following dates:

- a. March 17, 2014 – *Williams vs. Heritage Medical Center* (the trial should take two to three weeks).
- b. May 5, 2014 – *Sandoval vs. Memorial Family Practice Associates, LLC* (the trial should take two weeks).
- c. June 2, 2014 – *Foster vs. Skyridge Medical Center* (the trial should take four weeks).
- d. September 22, 2014 – *Owens vs. Stanley Meers, M.D.* (the trial should take two weeks).
- e. October 6, 2014 – *Jay Raja, M.D. vs. Englewood Community Hospital* (the trial should take three weeks).
- f. November 10, 2014 – *Flickinger v. Jeffrey Gleason, M.D.* (the trial should take one week).
- g. December 1, 2014 – *Dearmon vs. Barry Brown, M.D.* (the trial should take one week).

4. I will actively participate in the discovery process in the NECC MDL.

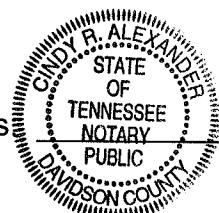


(Signature of Affiant)

STATE OF TENNESSEE )  
 )  
COUNTY OF DAVIDSON )

Sworn to and subscribed by me on this 5th day of February, 2014.

My Commission Expires



Cindy R. Alexander  
(Notary Public)